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Attorney for Jeri Coppa-Knudson, Trustee

**UNITED STATES BANKRUPTCY COURT**

**DISTRICT OF NEVADA**

IN RE: CASE NO. BK-N-14-50333-BTB  
ANTHONY THOMAS and CASE NO. BK-N-14-50331-BTB  
WENDI THOMAS, (Jointly Administered)  
AT EMERALD, LLC, CHAPTER 7  
Debtors.

\_\_\_\_\_  
JERI COPPA-KNUDSON, TRUSTEE, ADV. PROC. NO. 17-05005-BTB  
Plaintiff,

vs.

KENNETH CONETTO, ESTATE OF  
ERIC KITCHEN, KIMBERLY KLOTZ,  
WAYNE CATLETT and SHERIFF OF  
SANTA CLARA COUNTY,

Defendants.  
\_\_\_\_\_

**DECLARATION OF JEFFREY  
HARTMAN IN SUPPORT OF REQUEST  
FOR ENTRY OF DEFAULT PURSUANT  
TO F.R.CIV.P. 55 AND F.R.BANKR.P. 7055**

**Hearing Date: N/A  
Hearing Time:**

Jeffrey L. Hartman, under penalty of perjury of the laws of the United States,  
declares:

1. I am an attorney in good standing with the State Bar of Nevada and am admitted to practice in the this Court.
2. I have personal knowledge of the matters stated herein.
3. I represent Chapter 7 Trustee Jeri Coppa-Knudson, Plaintiff.
4. I filed this adversary proceeding on February 14, 2017 naming Kenneth Conetto,

1 Estate of Eric Kitchen, Kimberly Klotz, Wayne Catlett and Sheriff of Santa Clara County as  
2 the Defendants. The Summons was issued on February 15, 2017 and together with the  
3 Complaint, was served on Defendants by mail on May 11, 2017 as permitted by  
4 F.R.Bankr.P.7004(b) and (e). **Executed Summons, Adv. DE 10, filed with the Court on**  
5 **May 11, 2017.**

6 5. Two of the packages mailed to Wayne Catlett were returned as undeliverable; the  
7 third, mailed to a post office box, was not.

8 6. Because the information regarding the location of Defendants Estate of Eric  
9 Kitchen and Kimberly Klotz was outdated, summons was published in the areas of a last  
10 known address. **Adv. DE 18, 19.** Plaintiff has no current mailing address for Defendants  
11 Estate of Eric Kitchen and Kimberly Klotz.

12 5. On December 7, 2017, I filed a Notice Of Intent To Take Default. **Adv. DE 20.**  
13 The Notice Of Intent To Take Default which includes a Certificate of Service for mailing  
14 only to Wayne Catlett, provided that Defendants had until December 20, 2017 to answer or  
15 otherwise respond.

16 6. As of December 21, 2017, no Defendant has responded to the Notice Of Intent To  
17 Take Default.

18 7. I have attempted to conduct a search of the Service members Civil Relief Act  
19 website to determine whether Wayne Catlett, Megan Kitchen and Kimberly Klotz are active  
20 members of the military. Without any Social Security Number or date of birth, I have been  
21 unable to conduct the proper search at [www.dmdc.osd.mil/appj/scra/single\\_record.xhtml](http://www.dmdc.osd.mil/appj/scra/single_record.xhtml).

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1 8. Based on information provided to me by Plaintiff, I believe no Defendant herein  
2 is an infant, and there is no factual evidence known to me to support an opinion that any  
3 defendant is incompetent.

4 DATED: February 1, 2018.

6 /S/ Jeffrey L. Hartman  
7 Jeffrey L. Hartman, Esq.

8 CERTIFICATE OF SERVICE

9 I certify that I am an employee of Hartman & Hartman, and that on this date I caused  
10 to be served a copy of the within document upon:

11 Wayne Catlett  
12 PO Box 5692  
13 Santa Barbara, CA 93150-0647

14 DATED: February 1, 2018.

15 /S/ Stephanie Ittner  
16 Stephanie Ittner